

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD**

UPMC AND ITS SUBSIDIARIES
UPMC PRESBYTERIAN SHADYSIDE
AND MAGEE—WOMENS HOSPITAL
OF UPMC, SINGLE EMPLOYER, D/B/A
SHADYSIDE HOSPITAL AND/OR
PRESBYTERIAN HOSPITAL AND/OR
MAGEE-WOMENS HOSPITAL,

Employer

and

Case 06-CA-081896

SEIU HEALTHCARE PENNSYLVANIA,
CTW, CLC,

Charging Party.

**OPPOSITION TO MOTION
FOR LEAVE TO FILE BRIEF AS *AMICUS CURIAE***

UPMC, UPMC Presbyterian Shadyside, and Magee – Womens Hospital of UPMC (collectively, Respondents) oppose the American Federation of Labor and Congress of Industrial Organization’s (“AFL-CIO”) Motion for Leave to File Brief as *Amicus Curiae* (“Motion”) if the AFL-CIO is the only *amicus curiae* permitted to file a brief. However, if other non-parties are given the opportunity to submit briefs as well, Respondents do not oppose the AFL-CIO’s Motion. In prior cases involving unsolicited requests from non-parties to submit *amici* briefs, the Board has granted the requests and opened the record to other interested parties to file briefs. *See, e.g., D.R. Horton*, Case No. 12-CA-25764. This practice allows for a diversity of non-party viewpoints and positions – rather than only one – to be presented to the Board so that a full and fair decision can be reached. Thus, if the AFL-CIO is permitted to file its brief, Respondents respectfully request that other parties be invited to do so as well.

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Dated: April 14, 2014

CERTIFICATE OF SERVICE

Respondents' Opposition to Motion for Leave to File Brief as *Amicus Curiae* has been served by email on the National Labor Relations Board, Region Six on this 14th day of April, 2014 to the below address:

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I also certify that the foregoing was served on the following individuals by e-mail on the same day:

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